

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|--------------------------|---|-------------------------|
| KATRINA DOUGLAS, |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 07 C 6773 |
| v. |) | |
| |) | Judge Bucklo |
| CERTEGY PAYMENT RECOVERY |) | Magistrate Judge Valdez |
| SERVICES, INC., |) | |
| |) | |
| Defendant. |) | |

Defendant's Motion for Sanctions Against Plaintiff and Plaintiff's Attorneys

NOW COMES Defendant Certegy Payment Recovery Services, Inc. ("Defendant"), by and through its undersigned counsel, pursuant to Rule 11 of the Federal Rules of Civil Procedure, 28 U.S.C. §1927, and 15 U.S.C. §1692k(a)(3), move this Court to enter judgment in its favor and against Plaintiff and Plaintiff's Attorneys for sanctions, and in support thereof incorporates by reference its contemporaneously filed Memorandum in Support of this motion.

WHEREFORE, Defendant Certegy Payment Recovery Services, Inc. requests this Court enter an enter order granting sanctions in favor of Defendant and against Plaintiff and Plaintiff's Attorneys awarding Defendant its attorney's fees and costs incurred in defending this litigation and for any other relief this Court deems just.

Dated: May 5, 2008

Respectfully Submitted,

CERTEGY PAYMENT RECOVERY
SERVICES, INC.

By: /s/ Amy R. Jonker
One of its Attorneys

David L. Hartsell

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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2008, I electronically filed the foregoing
**DEFENDANT'S MOTION FOR SANCTIONS AGAINST PLAINTIFF AND
PLAINTIFF'S ATTORNEYS** with the Clerk of the Court using the CM/ECF system
which will send notification of such filing to the following:

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/s/ Amy R. Jonker

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